

**EXHIBIT 15**

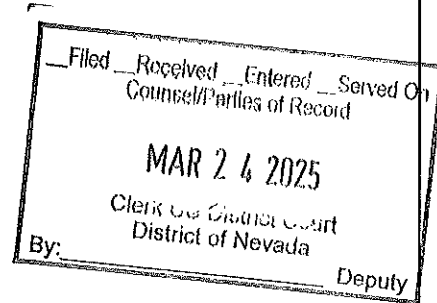
**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**DREW J. RIBAR,**  
Plaintiff, Pro Se,

v.

**WASHOE COUNTY, NEVADA, et al.,**  
Defendants.

**Case No.: 3:24-cv-00526-ART-CLB**



**EXHIBIT 15**

**Title:** Public Records Request – Library System

**Date:** July 6, 2023

**Bates Range:** EXH075-EXH083

**Total Pages:** 13

**Description:**

This exhibit contains email correspondence regarding Plaintiff's public records request concerning library policies and security procedures for Drag Queen Story Hour (DQSH) events.

The records demonstrate:

1. **Selective enforcement** of access policies favoring certain groups while restricting others.
2. **Government coordination** with private entities to restrict public access.

PLEADING TITLE - 1

1       3. **Denial of timely access** to public records, indicating potential violations of Nevada Open  
2       Records laws.

3  
4 **Legal Relevance:**

5  
6 This exhibit supports **Plaintiff's claims under the First and Fourteenth Amendments** and  
7 **NRS 239 (Nevada Public Records Act)**. It further evidences unconstitutional policies,  
8 reinforcing claims under:

- 9  
10       • **Monell v. Dep't of Soc. Servs., 436 U.S. 658 (1978)** – Establishing municipal liability  
11       for unconstitutional policies.  
12       • **Kreimer v. Bureau of Police, 958 F.2d 1242 (3d Cir. 1992)** – Confirming public  
13       libraries as designated public forums.  
14       • **Nevada Open Meeting Law (NRS 241.035)** – Potential procedural violations related to  
15       government decision-making.  
16  
17

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18  
19 **CERTIFICATE OF AUTHENTICITY**

20  
21 I, **Drew J. Ribar**, certify that the attached exhibit is a **true and accurate copy** of records  
22 obtained through **Public Records Requests from the Washoe County Library System and**  
23 **County Officials**. These records were received in response to a **formal request under NRS**  
24 **239**, Nevada's Public Records Law.  
25

26  
27 I declare under penalty of perjury that the foregoing is true and correct.  
28

1 **Dated:** March 18, 2025

2  
3 **Respectfully submitted,**

4 **/s/ Drew J. Ribar**

5 3480 Pershing Ln.

6 Washoe Valley, NV 89704

7 (775) 223-7899

8 Const2Audit@gmail.com

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PLEADING TITLE - 3

**From:** Scott, Jeff <jscott@washoecounty.gov>  
**Sent:** 06 July 2023 16:12  
**To:** Hemingway, Jamie; Andrews, John  
**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV  
**Attachments:**

Go ahead and block them. We can't have them spamming.

Thanks

Jeff

Jeff Scott  
Library Director | Washoe County Library System  
[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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**From:** Hemingway, Jamie & JHemingway@washoecounty.gov  
**Sent:** Thursday, July 6, 2023 9:08:57 AM  
**To:** Scott, Jeff & jscott@washoecounty.gov; Andrews, John & JAndrews@washoecounty.gov  
**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

As of this morning we've gotten spammed by Audit Reno 31 times. Same video reposted. I haven't blocked the account yet.

---

Jamie Hemingway  
Public Information and Development Officer | Washoe County Library System  
[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov) | Office: 775-327-8360  
301 South Center Street, Reno, NV 89501

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EXH075

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**From:** Scott, Jeff <jscott@washoecounty.gov>;  
**Sent:** Wednesday, July 5, 2023 12:48 PM  
**To:** Hemingway, Jamie <JHemingway@washoecounty.gov>; Andrews, John <JAndrews@washoecounty.gov>;  
**Subject:** RE: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

That sucks! Sorry to hear that.

Just hang on to that until I get an answer from Mary. I told them that he was blocked for spamming the chat. He has first amendment rights, but he can't interrupt our regular flow of business.

Thanks,

Jeff

</A> Jeff Scott  
Library Director | Washoe County Library System  
jscott@washoecounty.gov </Span></A> | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501  
</A> </A> </A> </A>

**From:** Hemingway, Jamie <JHemingway@washoecounty.gov>;  
**Sent:** Wednesday, July 5, 2023 12:47 PM  
**To:** Scott, Jeff <jscott@washoecounty.gov>; Andrews, John <JAndrews@washoecounty.gov>;  
**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

John found the blocked list on Facebook. We've only blocked 8 people. We'll start keeping track.

In drag story hour-related news, I just saw that the Drag Story Hour nonprofit is closing their Miami chapter... for obvious reasons. Sad!

</A> Jamie Hemingway  
Public Information and Development Officer | Washoe County Library System  
jhemingway@washoecounty.gov </A> | Office: 775-327-8360  
301 South Center Street, Reno, NV 89501  
</A> </A> </A> </A>

EXH076

**From:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>;  
**Sent:** Wednesday, July 5, 2023 12:43 PM  
**To:** Andrews, John <[jandrews@washoecounty.gov](mailto:jandrews@washoecounty.gov)>; Hemingway, Jamie  
<[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov)>;  
**Subject:** RE: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

He still can't spam the chat. He is just mad his little video isn't going viral. Nobody is watching after he talks to me.

Thanks,

Jeff

</A> Jeff Scott  
Library Director | Washoe County Library System  
[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501  
</A> </A> </A> </A>

**From:** Andrews, John <[jandrews@washoecounty.gov](mailto:jandrews@washoecounty.gov)>;  
**Sent:** Wednesday, July 5, 2023 12:22 PM  
**To:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>; Hemingway, Jamie  
<[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov)>;  
**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

We should probably revisit the social media policy. We had one years ago but it was rescinded some time before 2014 (not sure when, exactly, or why for that matter).

Sorry you're having to deal with this!

John

**From:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>;  
**Sent:** Wednesday, July 5, 2023 12:03 PM  
**To:** Hemingway, Jamie <[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov)>; Andrews, John  
<[jandrews@washoecounty.gov](mailto:jandrews@washoecounty.gov)>;  
**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

We can go over guidelines on how to handle him in the future (not social media but in person).

I'll read this more carefully from  
The League of California Cities

EXH077

[https://www.cacities.org/docs/default-source/city-attorneys/05.2023-spring-fox\\_szoke-what-to-do-when-first-amendment-auditors-come-to-town.pdf?sfvrsn=95bf0950\\_3#:~:text=Instances%20of%20the%20above%2C%20known,otherwise%20test%20local%20government%20officials.</A>](https://www.cacities.org/docs/default-source/city-attorneys/05.2023-spring-fox_szoke-what-to-do-when-first-amendment-auditors-come-to-town.pdf?sfvrsn=95bf0950_3#:~:text=Instances%20of%20the%20above%2C%20known,otherwise%20test%20local%20government%20officials.</A>)

Similar activity

<https://www.boston.com/news/the-boston-globe/2023/05/21/youtube-first-amendment-audits-insult-public-workers-massachusetts/</A>>

I would also say that in comparison to his other videos we handled it well. It's mostly me talking about the program and then being blocked from this kids area.

For Sparks we will probably have a better strategy to just keep all these folks in the protest zone. They activity is not permissible in the library and they have demonstrated intent to obstruct the program.

Thanks

Jeff

Jeff Scott  
Library Director | Washoe County Library System  
[</Span></A>](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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**From:** Scott, Jeff &<a href="mailto:jscott@washoecounty.gov"></A>&gt;  
**Sent:** Wednesday, July 5, 2023 11:53:46 AM  
**To:** Hemingway, Jamie &<a href="mailto:JHemingway@washoecounty.gov"></A>&gt;; Andrews, John &<a href="mailto:JAndrews@washoecounty.gov"></A>&gt;  
**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

Yes I am working with Mary on it. He can't just spam every post.

Thanks

Jeff

Jeff Scott  
Library Director | Washoe County Library System  
[</Span></A>](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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**From:** Hemingway, Jamie &<a href="mailto:JHemingway@washoecounty.gov"></A>&gt;

EXH 078

Sent: Wednesday, July 5, 2023 11:52:25 AM

To: Scott, Jeff <jscott@washoecounty.gov>; Andrews, John  
<jandrews@washoecounty.gov>;

Subject: Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

Thanks Jeff.

Here's just a sample of his spam posts as himself before being blocked, each one a repost of the video. Often on posts that have nothing to do with drag story hour.

</A>

Jamie Hemingway  
Public Information and Development Officer | Washoe County Library  
System  
jhemingway@washoecounty.gov | Office: 775-327-8360  
301 South Center Street, Reno, NV 89501  
</A> </A> </A> </A>

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From: Scott, Jeff <jscott@washoecounty.gov>;

Sent: Wednesday, July 5, 2023 11:50 AM

To: Hemingway, Jamie <jhemingway@washoecounty.gov>; Andrews, John  
<jandrews@washoecounty.gov>;

Subject: Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

And I would have told you to block him if you didn't already.

Like yes share the video on the Storytime. But to put it on every post no way

Thanks

Jeff

Jeff Scott  
Library Director | Washoe County Library System  
jscott@washoecounty.gov | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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From: Scott, Jeff <jscott@washoecounty.gov>;

Sent: Wednesday, July 5, 2023 11:48:37 AM

To: Hemingway, Jamie <jhemingway@washoecounty.gov>; Andrews, John

EXH079



<JAndrews@washoecounty.gov>

**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

I would leave it for now. Spamming is clearly not allowed.

He's obviously mad that no one cares about his video.

Thanks

Jeff

Jeff Scott

Library Director | Washoe County Library System

[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340

301 S. Center Street, Reno, NV 89501

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**From:** Hemingway, Jamie <JHemingway@washoecounty.gov>

**Sent:** Wednesday, July 5, 2023 11:44:07 AM

**To:** Scott, Jeff <jscott@washoecounty.gov>; Andrews, John <JAndrews@washoecounty.gov>

**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

I'm sorry to have created this fiasco by blocking. Apparently we need to have an official policy for patron behavior on social media? I found this:

<https://www.ala.org/advocacy/intfreedom/socialmediaguidelines#:~:text=Permanently%20blocking%20a%20patron%20from,Freedom%20of%20Information%20Act%2C%20request.>

Libraries should clearly state the consequences for posts that do not meet the library's social media policy, which should be drafted in consultation with legal counsel. Best practices include developing a procedure through which libraries notify patrons of why they are being blocked, provide an appellate process within the library for the patron to challenge the removal, and determine an acceptable time period for the patron to proceed through a reinstatement procedure. Permanently blocking a patron from the social media site based on prior comments could be considered a prior restraint in violation of the First Amendment.

The social media content of a public library or publicly funded academic library can be subject to an open records, or Freedom of Information Act, request. All user's posts that are removed for any reason whatsoever should be securely retained in accordance with your organization's retention schedule. The policy for how long a library retains these social media posts should be clearly stated in its social media policy and reviewed by legal counsel.

Library administrators should clearly communicate their social media policies and legal obligations to their vendors.

EXH080

</A>

**Jamie Hemingway**  
Public Information and Development Officer | Washoe County Library  
System  
[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov) | Office: 775-327-8360  
301 South Center Street, Reno, NV 89501  
</A> </A> </A> </A>

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**From:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>  
**Sent:** Wednesday, July 5, 2023 11:37 AM  
**To:** Hemingway, Jamie <[JHemingway@washoecounty.gov](mailto:JHemingway@washoecounty.gov)>; Andrews, John  
<[JAndrews@washoecounty.gov](mailto:JAndrews@washoecounty.gov)>  
**Subject:** Re: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

I will  
Email Mary Kanderas to let them know we blocked him for spamming and get guidance.

Thanks  
Jeff

**Jeff Scott**  
Library Director | Washoe County Library System  
[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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**From:** Hemingway, Jamie <[JHemingway@washoecounty.gov](mailto:JHemingway@washoecounty.gov)>  
**Sent:** Wednesday, July 5, 2023 11:35:24 AM  
**To:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>; Andrews, John  
<[JAndrews@washoecounty.gov](mailto:JAndrews@washoecounty.gov)>  
**Subject:** Fw: A new Service Request has been created [Request ID #139523] (Library System - Public Records Request) - Washoe County, NV

I did block him for spamming. He has got some other account (Audit Reno) to spam instead and they have been reposting the YouTube video on every post.

I can unblock him if that's better. But I think it's a weird request to know who we have blocked. Are we allowed to give him names of people we have blocked since the beginning of having our social media accounts? Don't even know how we find that info—especially historically if it still exists. There aren't many, but that seems like a privacy thing. Is it a first amendment violation to block people on social media? If so, I will unblock.

ENT081

</A>

Jamie Hemingway  
Public Information and Development Officer | Washoe County Library  
System  
[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov) | Office: 775-327-8360  
301 South Center Street, Reno, NV 89501  
</A> </A> </A> </A>

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**From:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>  
**Sent:** Wednesday, July 5, 2023 11:29 AM  
**To:** Hemingway, Jamie <[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov)>; Andrews, John  
<[jandrews@washoecounty.gov](mailto:jandrews@washoecounty.gov)>  
**Subject:** Fwd: A new Service Request has been created [Request ID #139523] (Library System - Public  
Records Request) - Washoe County, NV

Not sure about this one. Can we get this info?

Definitely justified for spam and hate speech. The person requesting has likely been blocked for  
spamming all of our socials with the YouTube video.

Thanks

Jeff

Jeff Scott  
Library Director | Washoe County Library System  
[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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**From:** Washoe 311 Public Records Requests <[washoe311-PRR@washoecounty.gov](mailto:washoe311-PRR@washoecounty.gov)>  
**Sent:** Wednesday, July 5, 2023 11:27:14 AM  
**To:** Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>  
**Cc:** Kandaras, Mary <[mkandaras@da.washoecounty.gov](mailto:mkandaras@da.washoecounty.gov)>  
**Subject:** FW: A new Service Request has been created [Request ID #139523] (Library System - Public  
Records Request) - Washoe County, NV

Greetings,

Below please find the Public Records Request received by Washoe311. Let us know if we can  
provide additional information.

Thank you,

Washoe311 Service Center – Public Records Requests

EXH082

Communications Division | Office of the County Manager  
[washoe311-PRR@washoecounty.gov](mailto:washoe311-PRR@washoecounty.gov) | Office: 3-1-1 | 775.328.2003  
| Fax: 775.328.2491  
1001 E. Ninth St., Bldg A, Reno, NV 89512  
</A> </A> </A> </A>

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**From:** Washoe311 &lt;[Washoe311@washoecounty.gov](mailto:Washoe311@washoecounty.gov)>&gt;  
**Sent:** Monday, July 3, 2023 8:07 PM  
**To:** Washoe311 &lt;[Washoe311@washoecounty.gov](mailto:Washoe311@washoecounty.gov)>&gt;  
**Subject:** A new Service Request has been created [Request ID #139523] (Library System - Public Records Request)- Washoe County, NV

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

## Washoe County, NV

A new service request has been filed.

### Service Request Details

**ID** 139523

**Date/Time** 7/3/2023 8:07 PM

**Type** Library System - Public  
Records Request

**Address** Washoe County

**Origin** Washoe 311

**Comments** Provide all of the individuals  
blocked or restricted from  
Washoe County Library  
System social media

**Submitter** Ribar, Drew

3480 Pershing Ln  
Washoe Valley, NV 89704  
[Const2Audit@gmail.com](mailto:Const2Audit@gmail.com)</A>

[View in QAlert](#)</Span></A>

Washoe County, NV

EXH083